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December 14, 2016

Via ECF

The Honorable Jose L. Linares, U.S.D.J.
United States District Court for the District of New Jersey
Martin Luther King, Jr. Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: In re Liquid Aluminum Sulfate Antitrust Litigation
Civ. Action No. 16-md-2687 (JLL) (JAD) (MDL 2687)
This Document Relates to: No. 16-cv-2873 (JLL) (JAD)

Dear Judge Linares:

This firm, along with Weil, Gotshal & Manges LLP, represents the GCC defendants¹ in the above-captioned actions. Along with other the IPP Moving Defendants,² we write to request a one-week extension, from December 16 to December 23, to file our motions to dismiss the Indirect Purchaser Plaintiffs' ("IPPs") Consolidated Class Action Complaint, and a corresponding one-week extension for the IPPs' response (to February 6, 2017) and the IPP Moving Defendants' replies (to March 2, 2017). Counsel for the IPPs consents to this request.

The basis for this request is to give the Court sufficient time to address our December 12, 2016 request [Dkt. No. 290] for permission to file a joint brief of no more than 60 pages and individual briefs of no more than 25 pages (35 for defendant USALCO). That request remains

¹ General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics, Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, and Chemtrade Solutions LLC.

² GEO Specialty Chemicals, Inc., Kemira Chemicals, Inc., C&S Chemicals, Inc., USALCO, LLC, Southern Ionics, Inc., Milton Sundbeck, Kenneth Ghazey, Frank Reichl, Amita Gupta, and Alex Avraamides.

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pending, and in an abundance of caution, the IPP Moving Defendants request this extension so that they have the benefit of Your Honor's ruling on the December 12 request before the briefs are due.

Respectfully submitted,

s/Richard H. Epstein

Richard H. Epstein

cc: All counsel of record (via ECF)


SO ORDERED: _____

DATED: 12/14/16